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December 9, 2013

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/09/2013

VIA ECF AND E-MAIL

Honorable Katherine Polk Failla
United States District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

MEMO ENDORSED

Re: Moroccanoil, Inc. v. Avon Products, Inc., Civil Action No. 13-CV-8378
(S.D.N.Y.) (Failla, J.)

Dear Judge Failla:

We represent the Defendant Avon Products, Inc. ("Defendant" or "Avon"), in the above-referenced action. We respectfully write to request a 30-day extension of time to answer, move, or otherwise respond to the Complaint filed by Plaintiff, Moroccanoil, Inc. ("Plaintiff" or "Moroccanoil"), on or about November 25, 2013. On behalf of Plaintiff, we also respectfully request that Plaintiff be granted an extension to reply, move, or otherwise respond to Defendant's answer and counterclaims, or any motions made in lieu of Defendant's answer and counterclaims.

The Defendant's response to the Complaint is presently due December 16, 2013. Plaintiff's time to reply to any answer and counterclaims filed on that date is presently January 6 (and Plaintiff's time to oppose any motion to dismiss is presently December 30). If granted, the revised scheduling would be as follows:

January 15, 2014: Defendant's time to answer, move, or otherwise respond to the Complaint; and

March 14, 2014: Plaintiff's time to reply, move, or otherwise respond to Defendant's answer and counterclaims, or any motions made in lieu thereof.

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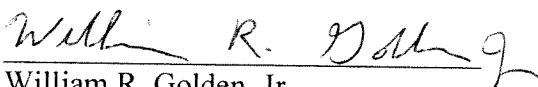
Plaintiff has consented to the present request for extensions and agreed to the revised deadlines proposed above.

This is our first request for an extension of time to respond to Plaintiff's Complaint. An initial pretrial conference under Fed. R. Civ. P. 16(c) has not been scheduled and a scheduling order has not been entered in this case. Granting the requested extensions will not cause any undue delay in this case, will not prejudice the Plaintiff or Defendant, and is not expected to interfere with any other deadlines pending in this case.

We thank the Court for its kind consideration of this application.

Respectfully submitted,

KELLEY DRYE & WARREN LLP


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Request GRANTED IN PART. Defendant shall respond to the Complaint by January 15, 2014. Plaintiff shall make its reply or opposition as may be appropriate by February 14, 2014.

Dated: December 9, 2013
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE